

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SAMSUNG ELECTRONICS CO., LTD.	)	
AND SAMSUNG SEMICONDUCTOR, INC.,	)	
	)	
Plaintiffs and Counter-Defendants,	)	
	)	
v.	)	C.A. No. 21-1453-RGA-JLH
	)	
NETLIST, INC.,	)	
	)	
Defendant and Counter-Plaintiff.	)	
<hr/> NETLIST, INC.,	)	
	)	
Counter-Plaintiff,	)	
	)	
v.	)	
	)	
GOOGLE LLC AND ALPHABET INC.,	)	
	)	
<hr/> Counter-Defendants.	)	

**MOTION FOR TELECONFERENCE**

Pursuant to the scheduling order (D.I. 61 at ¶ 9), Netlist, Inc. (“Netlist”) respectfully moves this Court to schedule a teleconference to address outstanding disputes regarding Netlist’s intent to amend its indirect infringement claims against Google LLC and Alphabet Inc. (“Google”). Netlist seeks leave to amend its pleading pursuant to the Court’s Report and Recommendation. *See* D.I. 161 at ¶ IV(4). The proposed amended pleading is attached as Exhibit A. The “blackline” comparison to the prior pleading is attached as Exhibit B.

The following attorneys for Netlist, Google, and Samsung Electronics Co., Ltd. and Samsung Semiconductor, Inc. (“Samsung”) participated in a verbal meet-and-confer by telephone on Friday, November 10, 2023:

- David Kahn (Lead Counsel for Netlist)

- David Perlson (Lead Counsel for Google)
- Kelly Farnan (Delaware Counsel for Google)
- Tom Garten (Lead Counsel for Samsung)

The following attorneys participated in an additional verbal meet-and-confer by telephone on Thursday, November 16, 2023:

- Emily DiBenedetto (Delaware Counsel for Netlist)
- Kelly Farnan (Delaware Counsel for Google)

As a result of these meet-and-confers, Netlist and Google have determined that they are at an impasse. Netlist and Google are available for a teleconference on the following dates:

December 4, 2023 (after 2:30 PM), December 5, 2023 (after 2:00 PM), December 12, 2023 (after 2:00 PM), and December 14, 2023 (between 12:00-3:00 PM).

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Dated: November 17, 2023